

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN, SOUTHERN DIVISION

CLEON BROWN,

Plaintiff,

Case No. 1:17-cv-00331-JTN-ESC

v.

HON. JANET T. NEFF

CITY OF HASTINGS, JEFF MANSFIELD,
JEFF PRATT, DALE BOULTER,
KRIS MILLER, JOSH SENSIBA and
FRANK CAMPBELL,

Defendants.

**STIPULATION REGARDING VOLUNTARY FACILITATIVE MEDIATION AND BRIEFING
SCHEDULE**

The parties, through undersigned counsel, submit the following stipulation for the Court's consideration:

1. The plaintiff has communicated a settlement demand to counsel for defendants.
2. On Monday, June 25, 2018, counsel for defendants met with the Hastings City Council in closed session to discuss the settlement demand.
3. As a result of the meeting with the Hastings City Council counsel for defendants contacted counsel for plaintiff on Tuesday, June 26, 2018 and proposed the parties engage in Voluntary Facilitative Mediation.
4. Counsel for plaintiff was agreeable and the parties agreed to use William Jack as the Facilitator.
5. The parties have contacted Mr. Jack and have secured July 18, 2018 as the date to conduct the Facilitation.

6. The parties are desirous of reaching a resolution of this matter and believe that resolution of this matter is achievable through VFM.

7. If a tentative resolution is reached at the Facilitation the settlement proposal would have to be approved by the Hastings City Council at a public meeting.

8. In order to minimize the cost to the parties in terms of time and resources expended the parties agree the Briefing Schedule should be suspended until settlement negotiations can be conducted through Facilitation.

9. The parties therefore request the Court suspend the current briefing schedule until further order of the Court.

Dated: June 26, 2018

BOYLAN LAW, P.C.

By: /s/Karie H. Boylan (with permission)
Karie H. Boylan (P55468)
Attorney for Plaintiff

Dated: June 26, 2018

PLUNKETT COONEY

By: /s/Michael S. Bogren
Michael S. Bogren (P34835)
Attorney for Defendants

Open.00560.71161.20539246-1